

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Case No. 4:23-CR-00163

v.

(Judge Brann)

JEREMY PAULEY

**DEFENDANT'S MOTION TO CONTINUE PSR OBJECTIONS DEADLINE**

AND NOW, this 30<sup>th</sup> day of January 2024, comes the Defendant, Jeremy Pauley, by and through his attorney, Jonathan R. White, Esquire and DETHLEFS-PYKOSH LAW GROUP LLC, and respectfully requests This Honorable Court to grant this Motion to Continue PSR Objections and in support thereof avers as follows:

1. On January 19, 2024, a Draft Pre-Sentence Report was filed by Probation for the above Defendant.
2. Objections to the Pre-Sentence Report are due on February 5, 2024.
3. Undersigned counsel and the AUSA are currently undergoing negotiations regarding loss amounts and restitution.
4. Undersigned counsel has been in back-to-back trials in Northumberland County, Commonwealth v. Isaiah Covert CP-49-CR-1272-2021 and this week in Dauphin County, Commonwealth v. William Bailey CP-22-CR-3015-2021.
5. Due to the aforementioned, defendant is respectfully requesting a continuance of the PSR Objections Deadline.
6. Defense counsel contacted Assistant United States Attorney Sean Camoni, Esquire, who is in concurrence with the filing of this Motion.

WHEREFORE, a continuance of the PSR Objections Deadline is respectfully requested.

Respectfully submitted,  
**DETHLEFS-PYKOSH LAW GROUP, LLC**

Dated: January 30, 2024

/s/ Jonathan R. White

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